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15 ESTABLISHMENT LABS HOLDINGS INC.
(erroneously sued as ESTABLISHMENT
16 LABS INC.) and MOTIVA USA LLC

17
18 UNITED STATES DISTRICT COURT
19 CENTRAL DISTRICT OF CALIFORNIA
20

21 RAMIN KHADEM,
22 Plaintiff,
23 v.
24 ESTABLISHMENT LABS INC.,
MOTIVE USA LLC, and DOES 1-50
25 inclusive,
26 Defendants.
27

Case No. 2:23-cv-01044-SVW-ADS

Assigned to the Hon. Stephen V.
Wilson

**JOINT NOTICE OF
SETTLEMENT**

[Local Rules 16-15.7, 40-2]

1 **TO THE COURT, THE PARTIES AND THEIR ATTORNEYS OF RECORD,**
2 **AND THE CLERK OF THE ABOVE-REFERENCED COURT:**

3 PLEASE TAKE NOTICE that pursuant to Local Rules 16-15.7 and 40-2,
4 Plaintiff RAMIN KHADEM (“Plaintiff”) and Defendants ESTABLISHMENT
5 LABS HOLDINGS and MOTIVA USA LLC (“Defendants”) (collectively, the
6 “Parties”) have reached a settlement that would dispose of the entire case, subject to
7 Court approval. The Parties jointly request that the Court vacate all pending deadlines
8 and the final pretrial conference set for August 7, 2023.

9 Documents are currently being prepared to finalize the resolution of this matter
10 and it is anticipated the Parties will file a stipulation for dismissal within twenty-one
11 days.

12 Dated: July 14, 2023

LAW OFFICE OF ROBIN MONTES

13
14 /s/ Robin D. Wood
15 Robin D. Wood

16 Attorneys for Plaintiff
17 RAMIN KHADEM

18 Dated: July 14, 2023

LITTLER MENDELSON, P.C.

19
20 /s/ Heather M. Vigil
21 Heather M. Vigil
22 Shelley L. Murray

23 Attorneys for Defendants
24 ESTABLISHMENT LABS HOLDINGS
25 INC. (erroneously sued as
26 ESTABLISHMENT LABS INC.) and
27 MOTIVA USA LLC

28 I attest that all other signatories listed, and on whose behalf the filing is
submitted, concur in the filing’s content and have authorized the filing.

/s/ Heather M. Vigil
Heather M. Vigil